

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

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|---|---|---|
| KELLY PINN, individually and on behalf of all others similarly situated, |) | |
| |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 4:24-cv-00266-P |
| |) | |
| vs. |) | |
| |) | |
| TRANSAMERICA LIFE INSURANCE COMPANY, NATHAN JOHNSON, AND BANUELOS INSURANCE AGENCY LLC D/B/A LEADS GURU, |) | |
| |) | |
| Defendants. |) | |

**DEFENDANT TRANSAMERICA’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE RESPONSE TO PLAINTIFF’S AMENDED COMPLAINT**

Defendant Transamerica Life Insurance Company (“Transamerica”), by and through its undersigned counsel, in accordance with Local Rule 7.1(h), files this Unopposed Motion for Extension of Time to File its Response to Plaintiff’s Amended Complaint and seeks an order extending the time to respond to Plaintiff’s Amended Complaint until September 19, 2024, and would respectfully show the Court the following:

1. On August 29, 2024, Plaintiff filed her Amended Complaint. Transamerica’s deadline to respond to Plaintiff’s Amended Complaint is September 12, 2024.
2. The extension of time will provide Transamerica and its counsel one additional week to prepare an Answer.
3. Plaintiff’s counsel does not oppose this motion.
4. The requested time will not have any impact on the current schedule.

5. Transamerica therefore asks this Court to grant this motion and enter an order extending the time for Transamerica to respond to Plaintiff's Amended Complaint until September 19, 2024.

Respectfully submitted,

/s/ Cary Slobin

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**ATTORNEYS FOR TRANSAMERICA LIFE
INSURANCE COMPANY**

CERTIFICATE OF CONFERENCE

Defendant has conferred with Plaintiff and the Motion is unopposed.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record in accord with the Federal Rules of Civil Procedure on this 12th of September 2024.

/s/ Cary Slobin